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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 OAKLAND DIVISION

15 SMITHKLINE BEECHAM CORPORATION, )  
d/b/a GLAXOSMITHKLINE, )

16 Plaintiff, )

17 vs. )

18 ABBOTT LABORATORIES, )

19 Defendant. )

Case No. C 07-5702 CW

*Related by Order to:*

Case No. C 04-1511 CW

**DECLARATION OF TREVOR V.  
STOCKINGER IN SUPPORT OF  
GLAXOSMITHKLINE'S MOTION TO  
COMPEL PRODUCTION OF  
DOCUMENTS RELATING TO  
MARKETING AND COSTS**

Date: August 7, 2008

Time: 2:00 p.m.

Courtroom 2

The Honorable Judge Claudia Wilken

DECLARATION OF TREVOR V. STOCKINGER

I, Trevor V. Stockinger, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff SmithKline Beecham Corporation, d/b/a GlaxoSmithKline ("GSK") in the above-captioned action. I am a member of good standing of the State Bar of California and have been admitted to practice before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. Attached hereto as Exhibit 1 is a true and correct copy of a document entitled "Norvir Price Increase: Abbott letter to doctors and clinicians," found at [http://www.natap.org/2003/dec/122903\\_7.htm](http://www.natap.org/2003/dec/122903_7.htm), printed on June 26, 2008.

3. Attached hereto as Exhibit 2 is a true and correct copy of "Abbott Laboratories' Norvir Plan" published on The Wall Street Journal Online on January 3, 2007, found at <http://online.wsj.com/articlejrint/SB116776479879065123.html>, printed on January 31, 2007.

4. Attached hereto as Exhibit 3 is a true and correct copy of a Warning Letter from the Department of Health & Human Services to Abbott Laboratories, found at <http://www.fda.gov/cder/warn/2004/macmis12335.pdf>, printed on June 26, 2008.

5. Attached hereto as Exhibit 4 are excerpts of a true and correct copy of Defendant Abbott Laboratories' Amended Responses to Plaintiff's First Set of Requests for Inspection and Production of Documents and Tangible Things (Nos. 1-37) served on April 15, 2008.

6. Attached hereto as Exhibit 5 is a true and correct copy of a February 18, 2008 letter from me to Charles B. Klein, counsel for Abbott Laboratories.

7. Attached hereto as Exhibit 6 are excerpts of a true and correct copy of Defendant Abbott Laboratories' Responses to Plaintiffs' First Document Requests served in *In re Norvir* on March 14, 2005.

8. Attached hereto as Exhibit 7 are excerpts of a true and correct copy of Abbott Laboratories' Responses to Plaintiffs' Second Request for Production of Documents served in *In re Norvir* on January 3, 2006.

1           9.       Attached hereto as Exhibit 8 is a true and correct copy of a May 7, 2008 letter from  
2 me to Matthew A. Campbell, counsel for Abbott Laboratories.

3           10.      Attached hereto as Exhibit 9 is a true and correct copy of a June 12, 2008 letter  
4 from me to Mr. Campbell.

5           11.      Attached hereto as Exhibit 10 are excerpts of a true and correct copy of Defendant  
6 Abbott Laboratories' Responses to Plaintiffs' Eighth Document Requests served in *In re Norvir* on  
7 May 25, 2007.

8           12.      Attached hereto as Exhibit 11 is a true and correct copy of a April 9, 2008 email  
9 from me to Mr. Campbell.

10          13.      Attached hereto as Exhibit 12 is a true and correct copy of a April 25, 2008 letter  
11 from Mr. Campbell to me.

12          14.      Attached hereto as Exhibit 13 is a true and correct copy of a June 10, 2008 letter  
13 from me to Mr. Campbell.

14          15.      Attached hereto as Exhibit 14 is a true and correct copy of a June 9, 2008 letter  
15 from Mr. Campbell to me.

16          16.      Attached hereto as Exhibit 15 is a true and correct copy of a May 19, 2008 email  
17 from Mr. Campbell to me.

18          17.      Attached hereto as Exhibit 16 is a true and correct copy of a June 6, 2008 email  
19 from Mr. Campbell to me.

20          18.      Attached hereto as Exhibit 17 is a true and correct copy of the June 5, 2008 email  
21 from me to Mr. Campbell.

22          19.      Attached hereto as Exhibit 18 are excerpts of a true and correct copy of GSK's  
23 Supplemental Response to Abbott Laboratories' First Set of Requests for Documents and Things  
24 to Plaintiff served on April 15, 2008.

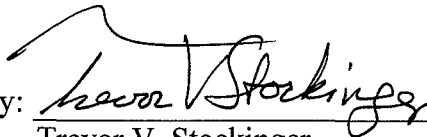
25          20.      Attached hereto as Exhibit 19 is a true and correct copy of a June 5, 2008 letter  
26 from Mr. Campbell to co-plaintiffs in the related cases and me.

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2 Dated: July 3, 2008

IRELL & MANELLA LLP

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5 By:   
6 Trevor V. Stockinger  
7 Attorneys for Plaintiff  
8 GlaxoSmithKline  
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